

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

JAMARE DIRRICK BAITY,

Plaintiff,

v.

No. 1:18-cv-00183-SCY-JHR

BRAD HALL AND ASSOCIATES

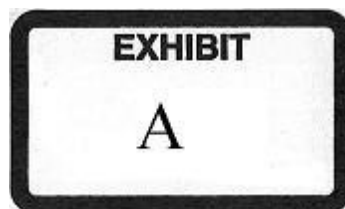
d/b/a GOOD 2 GO STORES, LLC,

Defendant.

**DEFENDANT GOOD 2 GO STORES, LLC'S
SECOND REQUESTS FOR PRODUCTION TO PLAINTIFF**

TO: Jamare D. Baity
836 Mesa Del Rio St. NW
Albuquerque, NM 87121

Defendant Good 2 Go Stores, LLC (“Good 2 Go”) pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure, serves these Requests for Production upon Plaintiff Jamare Dirrick Baity. Each Interrogatory is addressed to the personal knowledge of Plaintiff, as well as to the knowledge and information of Plaintiff’s attorneys, agents, and other representatives. When a question is directed to Plaintiff, the question is also directed to each of the aforementioned individuals. These Requests for Production are continuing in nature and require supplemental answers if the individuals to whom these Requests for Production is addressed obtain further or different information between the time answers are served and the time of the trial.



DEFINITIONS

1. “You,” “your,” or “Plaintiff” means Plaintiff Jamare Baity, his present and former employees, agents, and representatives, and all other persons acting or purporting to act on her behalf.

2. “Person” means and includes any natural person, partnership, joint venture, cooperative or unincorporated association, public or private corporation, public entity, governmental entity, or other entity, or any affiliate, officer, director, employee, agent, representative or attorney of any of the foregoing.

3. “Amended Complaint” means the Amended Complaint by Plaintiff filed in this Action.

4. “Action” means this lawsuit styled *Jamare Baity v. Brad Hall and Associates d/b/a Good 2 Go Stores, LLC*, No. 1:18-cv-00183-SCY-JHR United States District Court, District of New Mexico.

5. “Identify” when referring to a natural person, means to state the person’s full name, present or last-known address and telephone number, occupation, and job title.

6. “Identify” when used with respect to a document, means to describe the document and its subject matter, including, but not limited to, the title, date, bates number, or other identifying numbers thereon, author, intended recipient, persons to whom the document is addressed, general subject matter, and type of document, and shall further mean to state the present location and the identity of each person having possession, custody, or control of the document or any copy thereof. In lieu of identifying a document, a copy of the document may be attached to, or provided with, your answer to these Interrogatories if the document is clearly marked to indicate the particular Interrogatory answer to which it relates.

7. “Describe” means to state and identify the following: (i) the date of the communication, action, or fact; (ii) the person or persons present; (iii) the words or substance of the communication or fact; (iv) the person making each communication or performing each action; and (v) all documents relating to the communication, action or fact.

8. The term “Communication” refers to any written communication, oral conversation, telephonic communication, telegraphic communication, electronic communication, and any other form of communication whatsoever.

9. The term “Document” is employed in its broadest sense and includes, but is not limited to, the original and any non-identical copies of any written or graphic material of any kind or description whatsoever, whether draft or final, typed, handwritten, printed, stored in a computer or on a computer-readable medium, or otherwise, as well as any recording, photograph, computer text or graphics file, or any other reproduction, including, without limitation, the following items: notes, correspondence, memoranda, court filings, diaries, calendars, minutes or other records of meetings, lists, charts, spreadsheets, reports, summaries, transcripts, contracts, agreements, emails, bills, receipts, checks, invoices, records, financial statements, tax returns, computer printouts, and marginal comments appearing on any document.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 12: Please produce a copy of your W-2 forms from 2013 until present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13: Please produce a copy of your state and federal tax returns from the years 2013 until present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14: Please produce any and all documents relied upon in answering Defendant's First Set of Interrogatories to Plaintiff.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15: Please sign and return the attached authorizations to obtain employment records.

RESPONSE:

Dated: November 14, 2018

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: /s/ Anna E. Indahl

Anna E. Indahl

Post Office Box 2168

Albuquerque, New Mexico 87103-2168

Telephone: (505) 848-1800

aei@modrall.com

Attorneys for Defendant

W3311467.DOCX